

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

BRIGHT DATA LTD.,

Plaintiff,

v.

TESO LT, UAB, Oxysales, UAB, and  
Metacluster LT, UAB,

Defendants.

Case No. 2:19-CV-00395-JRG

**JOINT MOTION TO EXTEND MEDIATION DEADLINE**

Pursuant to the November 17, 2021 Order (“Order,” Dkt. 528) entered in this case, Plaintiff Bright Data Ltd. and Defendants Teso LT, UAB, Oxysales, UAB, and Metacluster LT, UAB (collectively, the “Parties”) have until January 3, 2022 to mediate this case before the Hon. David Folsom. Following issuance of the Order, the Parties promptly contacted Judge Folsom for his availability to mediate this case, but were informed that Judge Folsom’s December calendar is full and that the first available date for mediation is on January 6, 2022. The Parties have confirmed their ability to hold the mediation on that date. In order to accommodate the schedule of Judge Folsom, the Parties respectfully request that the mediation deadline be extended to January 10, 2022.

Dated: December 3, 2021

Respectfully submitted,

/s/ Ronald Wielkopolski

J. MARK MANN

Texas State Bar No. 12926150

mark@themannfirm.com

G. BLAKE THOMPSON

Texas State Bar No. 24042033  
blake@themannfirm.com  
**MANN | TINDEL | THOMPSON**  
300 West Main Street  
Henderson, Texas 75652  
Telephone: (903) 657-8540  
Telecopier: (903) 657-6003

KORULA T. CHERIAN  
sunnyc@ruyakcherian.com  
ROBERT HARKINS  
bobh@ruyakcherian.com  
**RUYAK CHERIAN LLP**  
1936 University Avenue, Suite 350  
Berkeley, California 94702  
Telephone: (510) 944-0192

RONALD WIELKOPOLSKI  
ronw@ruyakcherian.com  
**RUYAK CHERIAN LLP**  
1901 L Street, NW, Suite 700  
Washington, DC 20036  
Telephone: (202) 838-1560

S. CALVIN CAPSHAW  
Texas State Bar No. 03783900  
ccapshaw@capshawlaw.com  
ELIZABETH L. DERIEUX  
Texas State Bar No. 05770585  
ederieux@capshawlaw.com  
**CAPSHAW DERIEUX, LLP**  
114 E. Commerce Avenue  
Gladewater, Texas 75647  
Telephone: (903) 845-5770

*Counsel for Bright Data, Ltd.*

Dated: December 3, 2021

Respectfully submitted,

BRETT C. GOVETT  
Texas State Bar No. 08235900  
brett.govett@nortonrosefulbright.com

/s/ Steven Callahan  
MICHAEL C. SMITH  
Texas State Bar No. 18650410  
michael.smith@solidcounsel.com  
**SCHEEF & STONE, LLP**

**NORTON ROSE FULBRIGHT US LLP**  
2200 Ross Avenue, Suite 3600  
Dallas, Texas 75201  
Telephone: (214) 855-8000  
Telecopier: (214) 855-8200

DANIEL S. LEVENTHAL  
Texas State Bar No. 24050923  
daniel.leventhal@nortonrosefulbright.com

**NORTON ROSE FULBRIGHT US LLP**  
1301 McKinney, Suite 5100  
Houston, Texas 77010-3095  
Telephone: (713) 651-5151  
Telecopier: (713) 651-5246

113 East Austin Street  
Marshall, Texas 75670  
Telephone: (903) 938-8900  
Telecopier: (972) 767-4620

STEVEN CALLAHAN  
Texas State Bar No. 24053122  
scallahan@ccrglaw.com

CRAIG TOLLIVER  
Texas State Bar No. 24028049  
ctolliver@ccrglaw.com  
GEORGE T. "JORDE" SCOTT  
Texas State Bar No. 24061276  
jscott@ccrglaw.com

MITCHELL SIBLEY  
Texas State Bar No. 24073097  
msibley@ccrglaw.com

JOHN HEUTON  
Admitted *Pro Hac Vice*  
jheuton@ccrglaw.com

**CHARHON CALLAHAN**  
**ROBSON & GARZA, PLLC**  
3333 Lee Parkway, Suite 460  
Dallas, Texas 75219  
Telephone: (214) 521-6400  
Telecopier: (214) 764-8392

*Counsel for Defendants Teso LT, UAB,  
Oxysales, UAB and Metacluster LT, UAB*

### **CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) on December 3, 2021. As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ Ronald Wielkopolski

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that the counsels for the parties have complied with Local Rule CV-7(h). Counsel participating include: Robert Harkins, Ronald Wielkopolski, Betty DeRieux, Mark Mann, and Blake Thompson on behalf of Plaintiff; Steven Callahan and Becca Skupin on behalf of Defendants. The parties reached agreement during a telephonic meet and confer on November 30, 2021. Defendants join this motion.

*/s/ Ronald Wielkopolski* \_\_\_\_\_